

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

999 18th STREET - SUITE 500
DENVER, COLORADO 80202-2405

FEB 28 1980

Ref: 8AT-AP

Harry Keltz, Supervisor
Air Quality Bureau
Department of Health and
Environmental Sciences
Cogswell Building
Helena, Montana 59620

RE: Compliance Status of Columbia Falls Aluminum with Respect to
TSP and Opacity at the Potrooms

Dear Harry:

On February 20, 1990, Kris Knutson phoned you with several questions regarding the Columbia Falls Aluminum Company inspection report documenting the September 20, 1989 inspection. The purpose of this letter is to summarize that conversation and provide my understanding of how the compliance status of this facility will be resolved.

The inspection report indicates that the compliance status for TSP and opacity at the potrooms is unknown. My understanding is that the TSP emission limit in the permit is based on a regulation that has been replaced. Therefore, is the permit limit enforceable since the regulation referenced in the permit no longer exists? Please note that our records indicate that rule S14080 is in the federally approved SIP, and would be federally enforceable. You indicated that you would provide Kris with the State's determination on this issue. Furthermore, EPA also may have some concerns about the compliance demonstration method for this emission point. You indicated that you would send information on the roof monitor sampling method for our review.

The issue of compliance demonstration with the opacity limit for this source was first identified as a problem in July of 1988. The inspection report indicated that an amendment to ARM 16.8.1503 is now under consideration. Please provide a projection of when the State will amend ARM 16.8.1503, and submit the amendment to EPA as a SIP revision.

Mc: LWS
TFD
ΔTF

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MR. C. L. Y. L. L.

Please provide the information requested by March 23, 1990. EPA will consider the compliance status of this source to be unknown until these issues are fully resolved. If you have any questions regarding these requests, please contact Kris Knutson at (303) 293-1754.

Sincerely,

A handwritten signature in cursive script, reading "Marius Gedgaudas".

Marius Gedgaudas, Chief
Compliance Section

cc: Eric Finke, 8MO